DOCUMENT RESUME

ED 478 441 CE 085 097

AUTHOR	Ng, Roxana
TITLE	Training for Whom? For What? Reflection on the Lack of Training Opportunities for Immigrant Garment Workers. NALL Working Paper.
INSTITUTION	Ontario Inst. for Studies in Education, Toronto. New Approaches to Lifelong Learning.
SPONS AGENCY	Social Sciences and Humanities Research Council of Canada, Ottawa (Ontario).
REPORT NO	No-66
PUB DATE	2002-00-00
NOTE	11p.; Paper presented at "Employment-Related Training for Immigrant Women: A Forum on the Role of Employment and Training in the Settlement of Immigrant Women in Toronto" and subsequently published in the "Toronto Training Board Community Working Papers Series 1/1" (May 2002).
AVAILABLE FROM	For full text: http://www.oise.utoronto.ca/depts/sese/csew/nall/res/6Roxana%20Ng .pdf.
PUB TYPE	Reports - Research (143) -- Speeches/Meeting Papers (150)
EDRS PRICE	EDRS Price MF01/PC01 Plus Postage.
DESCRIPTORS	*Dislocated Workers; Education Work Relationship; Educational Attitudes; Educational Needs; *English (Second Language); Foreign Countries; *Immigrants; Industrial Training; *Informal Education; Labor Education; Labor Market; *Needle Trades; Needs Assessment; Non English Speaking; Outcomes of Education; Political Socialization; Semiskilled Occupations; Student Attitudes; Teleworking; *Womens Education
IDENTIFIERS	Asians; *Canada; Contextualized Instruction; Cottage Industry

ABSTRACT

Unlike many recent immigrants who entered Canada as highly trained professionals in their countries of origin, most of Canada's immigrant garment workers are working-class women with little education. The Apparel Textile Action Committee (ATAC) and Homeworker's Association (HWA) are among the bodies that were established to assist immigrant garment workers in Canada who lost their jobs to industrial restructuring and became home workers. The experiences of both bodies has made it clear that the training available to these women does not meet their needs as immigrants with a limited command of English. A study of the informal learning outcomes of HWA's members yielded the following findings: (1) most immigrant garment workers have little expectation that taking classes will lead to better jobs and higher pay; (2) although most immigrant garment workers do not expect that English-as-a-second language (ESL) classes will make them fluent in English, their ESL classes serve important social and educational purposes by giving participants a place to develop a sense of sociability with other workers and learn strategies for negotiating their lives as non-English speaking immigrants and their rights as workers; and (3) although classes are obvious places to look for informal learning, the HWA's executive meetings provide environments for explicit "political learning." (MN)

Reproductions supplied by EDRS are the best that can be made
from the original document.

ED 478 441

NALL Working Paper # 66

TRAINING FOR WHOM? FOR WHAT?

Reflection on the Lack of Training Opportunities for Immigrant Garment Workers[1]

Roxana Ng, Ph.D.

PERMISSION TO REPRODUCE AND DISSEMINATE THIS MATERIAL HAS BEEN GRANTED BY

D.W. Livingstone

TO THE EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC)

1

U.S. DEPARTMENT OF EDUCATION
Office of Educational Research and Improvement
EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC)

This document has been reproduced as received from the person or organization originating it.

☐ Minor changes have been made to improve reproduction quality.

• Points of view or opinions stated in this document do not necessarily represent official OERI position or policy.

NALL the research network for New Approaches to Lifelong Learning

Le Réseau de recherche sur les nouvelles approches de l'éducation permanente

[1] This presentation was made at "Employment-related Training for Immigrant Women - A forum on the role of employment and training in the settlement of immigrant women in Toronto." It was published subsequently in the *Toronto Training Board Community Working Papers Series* 1/1 (May 2002) edited by Soraya Peerbaye under the title, "Training for whom? For what? Reflections on the meaning of training for garment workers." I want to thank Rick Sin (former Executive Director of the Chinese Canadian National Council Toronto Chapter) for inviting me to participate in the forum, and Soraya Peerbaye for her superior editing to render the text accessible to a lay audience. Thanks are also due to NALL for funding some of the research on which this presentation is based.

CE065 097

BEST COPY AVAILABLE

Introduction: Contextualizing Training Opportunities for Immigrant Garment Workers

Today, I will speak about an invisible and forgotten group of immigrant women - women who work in the garment industry. Many of these women are homeworkers (that is, women who sew from their homes); the majority of them are from Asia, notably from Hong Kong and China. Unlike many recent immigrants who entered Canada as highly trained professionals in their countries of origin (see Leela Viswanathan's presentation), these are working-class women with little education; many do not speak English proficiently. Presently, there is a myth in Toronto that Chinese immigrants are rich; they bring lots of money into Canada and live in monster homes. So we don't have to worry about them. This myth is shattered when we look at the living and working conditions of immigrant garment workers. Not only are they not rich. They are the subjects of severe exploitation, and sexism and racism in the labour market. In terms of training, there are also few opportunities for this groups of immigrant women. Thus, my experience and knowledge about training issues is limited. What I want to share with you today is my reflections on what training and learning may entail for this particular group of immigrant women, in the hope that those of you working in this area will be able to create opportunities for garment workers or facilitate their learning experiences.

In order for you to understand the lack of training for immigrant garment workers, I need to give you some background of the changes that have occurred in the garment industry since the 1980s, and how I came to work with this group of women. My work with garment workers dates back to about ten years ago, around 1990, when major restructuring was taking place in this industrial sector. During the two decades between the late 1970s and mid-1990s, the garment sector has undergone major changes. Increasing global competition, especially since the signing of free trade agreements, enabled manufacturers and retailers to produce garments in places such as Mexico with cheaper labour costs. Off-shore production was also facilitated by the setting up of "free trade zones" in so-called Third World countries such as China. Improved distribution and transportation systems enabled garments to be delivered more quickly from production sites, even in far-away places, to retail stores in North America.

During this period, control of the industry shifted from manufacturers to large retail chains such as the Hudson's Bay Co. (which owns Zellers, Simpson's, Robinson's & Fields, and Kmart), and more recently to transnational chains such as Wal Mart. Retailers' strategy, to keep up with global competition, is to deliver the most fashionable clothes to the market quickly. This is made possible, among other things, by technological innovations such as electronic data interchange to control the production process. This kind of computerized technology enables retailers to keep better records of their stock and to keep fewer stock. Sales of garments on the rack in retail stores can be communicated to production plants almost instantaneously anywhere in the world. This cuts down on mass production, storage and other overhead costs. Retailers also demand quicker turn-around time for production, and that suppliers provide garments on consignment, and/or at last year's price.

Manufacturers in Toronto responded to their loss of control and technological changes in three ways: many retired and got out of the business. The larger firms began to produce off-shore, as already mentioned, either by setting up factories in cheaper locations or by contracting production to factories established in Latin America or Asia, for example. Finally, and this is the most relevant to our discussion, many become subconstractors to retailers by becoming jobbers. This is done by reducing the production plant, retaining a few cutters, and laying off sewing machine operations by using homeworkers who sew on a piece-rate basis. In fact, many factory workers become homeworkers in this context. The effect of these changes was closure and downsizing of many operations, leading to massive worker displacement and lay-off. Although since the mid-1990s the garment industry has been experiencing growth, it has not reversed this trend of casualization (i.e., employing workers on a casual, rather than permanent basis, and using homeworkers as a cheaper and more "flexible" source of labour).

With the displacement that occurred in the 1980s and 1990s, the garment unions[2] suffered major setbacks. Whereas the garment sector enjoyed a relatively high unionization rate (up to 40 percent) for immigrant and women workers in the 1960s and 1970s, unionization rate dropped to below 20 percent by the early 1990s.[3] In response to this massive displacement of workers, the two unions (ILGWU and ACTWU) approached the federal government's Industrial Adjustment Services (IAS) for money to set up a labour adjustment committee to look into the conditions of workers and what could be done to ameliorate their plight on a sector-wide, rather than plant-by-plant basis.[4] The union representatives on the committee rejected the roster of chairs provided by the government, because they wanted someone who understood and was sympathetic to the experiences of immigrant workers. It was in this context that I was recommended, on the basis of my research on immigrant women and activism in the immigrant women's community, to act as the chairperson of the Apparel Textile Action Committee (ATAC) from 1990 to1994.

---

[2]Historically there were two major unions in the garment and textile sector in Canada: the International Ladies Garment Workers Union (ILGWU), and the Amalgamated Clothing and Textile Workers Union (ACTWU). With the severe decrease in membership, especially for the ILGWU, during the two decades of restructuring, they merged in 1995 to form a new union, UNITE (Union of Needletrades, Industrial and Textile Employees).

[3]See Jan Borowy, Shelly Gordon and Gayle Lebans, "Are These Clothes Clean? The Campaign for Fare Wages and Working Conditions for Homeworkers" in *And Still We Rise: Feminist Political Mobilizing in Contemporary Canada* edited by Linda Carty (Toronto: Women's Press, 1993), p. 299-330.

[4]Space does not permit a detailed description of how the IAS and this particular labour adjustment committee operated. For a discussion, see Roxana Ng, "Restructuring Gender, Race, and Class Relations: The Case of Garment Workers and Labour Adjustment" in *Restructuring Caring Labour: Discourse, State Practice, and Everyday Life* edited by Sheila M. Neysmith (Toronto: Oxford University Press, 2000), p. 226-245.

Meanwhile, on the basis of the same experience, I was asked to be one of the academic resource persons for a research program, TARP (Technology Adjustment Research Program)[5] launched by the Ontario Federation of Labour (OFL) to investigate the impact of technological changes on workers in various industrial sectors. It was in this capacity that I became involved in a research project, spearheaded by the ILGWU, investigating how restructuring had affected workers in the garment industry. Thus, for the next three and a half year, I worked closely with garment workers and came to learn about the dramatic changes affecting the industry and its workers. In the remainder of this presentation, I will describe my experience with ATAC, and give three examples to illustrate how the conventional notion of training does not benefit or address the needs of this group of workers. I will then describe my more recent experience working with the Homeworkers' Association (HWA) to see how we may re-conceptualize training to meet the real needs and demands of these workers.

The Lack of Fit between Training Programs and Garment Workers' Needs

ATAC has two arms: the policy arm, which consisted of government consultants, union and community representatives, and resource people (from the local college and Canada Employment centres), chaired by an impartial person with knowledge and experience in the sector and adjustment activities (myself in this case). This group met monthly to review the situation in the garment industry, evaluate committee goals, and set directions for its future work.

In addition, an Action Centre was set up to handle the day-to-day activities arising out of the adjustment process, such as tracking the workers and providing them with information pertinent to job displacement (e.g., how to obtain UI[6], and programs and services for unemployed workers). The Action Centre was staffed by a coordinator and two displaced workers. The idea was to train unemployed workers to help each other and to help themselves. The paid staff were responsible for service provision for their clients, namely displaced workers from garment and textile plants who did not belong to plant-based adjustment committees. To give a sense of the scope of the problem in the garment sector, the Action Centre saw an average of just over 580 clients in a month.[7] This is in addition to the displaced workers who belonged to plant-based committees, and did not include workers who were not unionized. The staff also liaised with other organizations with similar mandates, including other adjustment committees, government and educational programs (such as

---

[5]TARP was a special five-year research grant given to the OFL by the NDP government between 1990 and1995. The OFL set up a team of academics to act as research support to those unions receiving funding from TARP. It was cut by the Conservative Harris government.

[6]Unemployment Insurance (UI), now Employment Insurance (EI).

[7]Statistics provided by ATAC staff, December, 1993 to July, 1994 in Apparel Textile Action Committee (ATAC), Final Report, March 9, 1993-July 8, 1994, Appendix 4, ATAC Client Status, December 1, 1993 - July 8, 1994.

Canada Employment Centres and colleges), and community-based organizations providing adjustment services.

The IAS program had no formal evaluation procedures. In a closure situation, the effectiveness of the committee was measured by types and levels of activities (e.g., workshops, counselling sessions, contacts with workers) and the number of workers "adjusted" through the committee (i.e., workers who no longer needed help from the Action Centre). The target was to reduce the number of workers needing assistance, and increase the number placed in jobs, or in training and other programs. So, for example, the Action Centre kept statistics on whether clients needed help. In the "require no help" category, figures were broken down further to indicate the number of people who were employed, in training or other assistance programs (e.g., on welfare, worker compensation), retired, and so forth. An examination of the statistics between December 1993 and July 1994 reveals that during this period of time, there was an increasing proportion of workers (from about 60 percent to 90 percent) requiring no help.[8] Workers were thus seen to be "adjusted" successfully. In fact, this kind of record keeping masked the transformation of garment workers' livelihood from working in a factory to home working, since women who worked at home would not be needing help from the Action Centre.[9] In addition, these statistics do not tell us about the kinds of jobs workers got, their working conditions, or whether they actually stayed in training programs.

Let me digress here to briefly outline the characteristics of non-English speaking immigrant women workers. In my previous writing, I have referred to them as a captive labour force.[10] They are both essential to and disposable in a capitalist economy. (When they become redundant, as many are in the garment sector, they become a reserve army of labour - a flexible labour pool upon which new or other industrial developments can draw.) They are available to the low-skilled and low-paid sectors, with little or no opportunity for job advancement, and they are pushed out or pushed to the margin when industrial decline occurs. Viewed in this framework, labour adjustment efforts served to perpetuate the captivity of this labour pool while giving the appearance that it was cared for by state programs, thereby sustaining the myth of free labour and worker mobility under capitalism. The following examples illustrate my point.

---

[8]Apparel Textile Action Committee (ATAC), Final Report, March 9, 1993-July 8, 1994, Appendix 4, ATAC Client Status, December 1, 1993 - July 8, 1994.

[9]Since the Action Centre did not ask for the sex of their clients, it is impossible to know the gender breakdown from the statistics. I don't mean to suggest that this kind of record keeping was developed to conceal the changing livelihood of garment workers. I am saying that statistics do not tell the full story of people's lived reality.

[10]Roxana Ng, "Racism, Sexism, and Immigrant Women" in *Changing Patterns: Women in Canada*, edited by S. Burt, L. Code and L. Dorney (Toronto: McClelland & Stewart, 1993), p. 279-308.

Example One: One of the key stipulations of IAS committees was that they could not receive other funding. Nor could they use IAS money to purchase training for unemployed workers. The mandate of the Action Centre was to provide counselling and assessment services (which could be purchased with IAS funding); to refer workers to other agencies in the service delivery network (such as community-based agencies and local community colleges); and to place them in jobs (which were dwindling in the garment sector). When the Action Centre staff attempted to refer many non-English speaking workers to other community and government services, however, frequently staff members were told that these workers were not eligible for the programs. For example, many programs (ultimately state funded) required English language proficiency. Participants were selected on the basis of their perceived ability to succeed in the program. Non-English speaking workers with low educational and skill levels were seen to be less likely to succeed in the program. These eligibility criteria, coupled with the shrinking social safety net characteristic of this period of economic contraction and restructuring, meant that workers at the bottom rung of the labour hierarchy were most disadvantaged.

Example Two: The IAS committees' mandate was to facilitate upgrading for workers *within* a particular industrial sector. There was no provision for re-training workers so that they could move into a different line of work. Although sewing machine operators could acquire more experience and become more skillful (frequently as they gain more experience), there is little upgrading that would enable them to move up the rank. This is especially the case as piece production (such as sewing only pockets, collars, and so forth) is increasingly the norm in garment production. Some sewing machine operators I talked with would like to acquire new skills to enable them to change jobs, but they would not be eligible for services provided through IAS funding. Thus, this type of program does not really meet the training needs of garment workers who are sewing machine operators.

Example Three: One notion of a successful adjustment process was the development of an individual action plan (that is, whether the individual was able to develop, with the help of the Action Centre staff, a set of goals for re-training, skill upgrading, and future employment, and a time frame and strategies for achieving these goals). In fact, action plans were by and large irrelevant to workers in the lower echelon of the garment sector. Most workers in this captive labour pool had little formal education and training. Employers deploying this labour pool made use of skills workers (mostly women) acquired in domestic settings (sewing being one of them). Since these workers' wages were an essential part of the household economy, unless they received equivalent subsidies for language and training programs, workers were unlikely to take advantage of these programs because their immediate financial need and their family responsibilities overrode other considerations. They are the reason why many immigrant women saw home-working a viable alternative, when in fact home- working serves to keep them captive in dead-end labour pools.

In this discussion, we see that the problems arising out of the structure of the labour market and the organization of the service delivery system, including the delivery of training, are treated as individuals' attributes. The failure of workers to secure employment or to succeed in training programs is seen as a deficit in either their language, their skills, or their (inferior) ability. What remains invisible is how the capitalist labour force is organized hierarchically. While industrial

adjustment may benefit employers who are contemplating reorganization, or a select group of workers in the high skilled sector(s) (such as auto workers), it is one of the ways in which many immigrant women workers are held captive. In summary, immigrant garment workers encounter three major barriers that hold them captive in particular sectors of the labour market: educational and language requirements; women's family responsibilities and the lack of affordable childcare; and the devaluation of women's skills.

Rethinking Training from the Standpoint of Immigrant Garment Workers

In this final section, I will describe my current work with the Homeworkers Association (HWA), to show how we may re-think training in relation to people's needs holistically, rather than narrowly only in terms of jobs.

The HWA came into being in the spring of 1995, when many garment workers lost their jobs to industrial restructuring and became homeworkers. The purpose of the HWA is to give homeworkers, many of whom were previously unionized workers and who are now isolated working at home, a place to get together. As a community-based organization affiliated with the ILG (now UNITE - see Footnote 2), the HWA provides members with job-related services (such as how to file income tax as home-based workers) and social activities (such as Christmas parties and outings in the summer). As well, it organizes classes (such as ESL - English as a Second Language; basic, intermediate, and advance sewing machine operation; sewing machine repairs; and pattern making) that address the employment and social needs of homeworkers.

In early 1999, I asked for permission to observe some of these classes as part of a project investigating the informal learning outcomes of immigrant women.[11] In this context I observed three types of learning sites: the pattern making class, which ran for eight weeks in the spring of 1999; an ongoing ESL class, which I attended from January to March of 2000; and the executive meeting of the HWA, which takes place monthly. Although I am still analyzing the findings for this project, I will share my preliminary analysis with you because they point the way to a different way of thinking about training, grounded in the everyday experiences of immigrant garment workers, that may inspire us to conceptualize training differently -- from the standpoint of workers rather than from that of employers and bureaucrats. Here are three major observations from my research findings:

First, workers have little expectation that taking classes will lead to better jobs and higher pay. They are very realistic about the jobs they have and the lack of advancement within the

---

[11]My study entitled, "Labour Adjustment and Job Training Programs: Implications for Immigrant Women Workers," was funded by The Network on New Approaches to Life Long Learning (NALL) at the Ontario Institute for Studies in Education. The financial assistance of NALL is gratefully acknowledged.

industry. Many students who take the pattern making class do so for social and personal reasons: they meet other people working in the same industry; they would like to learn how to make their own clothes; many consider this a family outing because they can bring their children, who get to play with other children and learn Mandarin with the childcare worker hired to look after the children. One of the two men who took the pattern making class described to me in detail what it would take to become a cutter in his factory, which he wasn't aspiring to be; he wanted to learn how to make his own trousers and jackets because the stylish ones are beyond his means to purchase. Another man attended simply because his parents, whom he supported on his two jobs, wanted him to attend in the hope that he would obtain a better position. He was very realistic about his lack of opportunity in the clothing industry, but came to class out of a sense of duty.

In terms of the ESL classes, the students do not expect to be able to become fluent. However, they do feel that learning more English may enhance communication with supervisors and other workers in their work place. Some want to be able to understand official mail and notices their children bring home.

Secondly, these classes are a place for workers to develop a sense of sociability with other workers. In this sense they serve an important social and educational purpose. Socially, workers meet other workers who share similar working conditions and experiences. While this shared sense of self is implicit in the classes, it becomes explicit when they interact with each other during coffee breaks. Over tea and cookies, workers inquire after each other's working conditions, wages, and so on. When there is a perceived injustice they encourage and support each other to launch a complaint. In some ways this is a form of political socialization, as this example shows: during the break of the pattern making class for several weeks Mary (a pseudonym) mentioned how she and other workers in her factory did not get paid for a long weekend when they were sent home early.[12] Unless they were told ahead of time, according to the law, they should be paid. Attempts to talk to the supervisor and one of the owners had produced no result. The other workers told her to talk to the coordinator, who had just resigned and the new coordinator had just assumed her position. They consulted with me, and asked if I could intervene on Mary's behalf. I did make some inquiries, but the matter was resolved before the union stepped in. This example displays the kinds of issues that are discussed during the break that cements worker solidarity. It is also a way that workers learn from each other strategies for negotiating their lives as non-English speaking immigrants who may not initially know how to assert their rights as workers.

---

[12]At the time of my study, many homeworkers have moved back to work in factories, indicating the continuous changes that take place in this industrial sector. As a matter of fact, there is now a fluidity between different categories of workers, who move between factory and home-based work depending on market conditions, much of them are seasonal and cyclical. So members of the HWA consist of a mix of workers, even though it retains its title as the Homeworkers' Association.

Thus, whereas during class time workers acquire formal knowledge about certain subject matters, such as how to make a pattern or learning basic work place English, it is during the workers' social time together that they acquire a collective worker identity and informal knowledge about negotiating lives as immigrants and as working people.

Thirdly, while the classes are obvious places to look for informal learning, in the case of the HWA it is in the executive meetings that what I call "political learning" becomes most explicit. By this I am referring to the ways in which the coordinator does and can work with workers to develop their leadership and organizational skills and motivate them to develop these abilities. This the new coordinator does very well, albeit not always in a conscious way. An example is her insistence that the executive members (elected from the HWA membership) conduct the meeting according to an agenda, and urge them to think through how the organization and the activities they undertake can be improved and changed. One executive member commented to me, during an informal interchange, that she liked this style of conducting meetings. Before, she felt that executive meetings were another social occasion where they just came together to chat; then the coordinator took their ideas and attempted to develop activities out of the casual conversations. Now, she sees clearly what they are discussing, and what decisions are being taken because minutes are written up and sent to the executive members afterwards. The coordinator also asks the members explicitly to take on more responsibilities for developing activities, and for organizing them. Thus members develop a sense of ownership of the outcomes. These meetings can be very animated, where different views are expressed and debated.

What lessons can be gleaned from my findings from a training perspective? Although my observations were limited in duration and although I was observing a specific group of workers, my observations of this group of workers confirm other studies that learning is contextual. People learn best and most effectively in situations where they feel comfortable; where what they learn is based on or arises from their work or family situations; and where the curriculum and discussion is related to their work, cultural and community experiences. Furthermore, training and learning from the worker's standpoint involves more than learning specialized and specific skill sets for a job. It involves learning about worker's rights, and how to negotiate with employers and other workers around their rights, responsibilities and obligations, again not only in relation to a job, but in relation to the work place and the larger society. As gleaned from the discussion above, training from the worker's standpoint may also include the development of leadership and organizational skills, so that workers can be empowered to take control over their lives while recognizing that their control is circumscribed by the larger framework of the work place and the labour market. Finally, training, like other forms of learning, may be most effective and enduring if undertaken in a supportive environment, where workers have the opportunities to interact with other like-minded people sharing similar working and living conditions. While cognizant that my discussion is inconclusive at this stage, I want to sum up by reiterating the two major insights gained from my study:

First, I maintain that training has been defined largely from the standpoint of employers and those working closely with employers, *not* workers. Beginning from workers' standpoint will yield new and different insights into alternative forms of training and worker education. Secondly, from a worker's perspective, training and learning is not limited to a skill set tired narrowly to a particular

job. These activities are fully embedded in workers' lives as employees, parents, immigrants, and so forth. Beginning from their experience will expand current thinking on training. It will enable policy makers and educators to develop a more encompassing approach to training that takes into account workers' multiple needs.

Additional References on Training

Dunk, Thomas, Stephen McBride, Randel W. Nelsen (eds.) 1996 The Training Trap: Ideology, Training and the Labour Market. Winnipeg & Halifax: Society for Socialist Studies and Fernwood Publishing.

Jackson, Nancy (ed.) 1992 "Training for What? Labour Perspectives on Skill Training" Special Issue of *Our Schools/Our Selves*, November 1992.

Neysmith, Sheila (ed.) 2000 Restructuring Caring Labour: Discourse, State Practice, and Everyday Life.Toronto: Oxford University Press.

Schenk, Christopher and John Anderson (eds.) 1995 *Re-Shaping Work: Union Responses to Technological Change*. Toronto: The Ontario Federation of Labour.

U.S. Department of Education
Office of Educational Research and Improvement (OERI)
National Library of Education (NLE)
Educational Resources Information Center (ERIC)

NOTICE

Reproduction Basis

[X] This document is covered by a signed "Reproduction Release (Blanket)" form (on file within the ERIC system), encompassing all or classes of documents from its source organization and, therefore, does not require a "Specific Document" Release form.

[ ] This document is Federally-funded, or carries its own permission to reproduce, or is otherwise in the public domain and, therefore, may be reproduced by ERIC without a signed Reproduction Release form (either "Specific Document" or "Blanket").